

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

X
:
SARAH EDMONDSON, et al.,
:
:
Plaintiffs,
:
: Case No.: 1:20-cv-00485-ERK-SMG
v.
:
:
:
KEITH RANIERE, et al.
:
:
Defendants.
:
-----X

STIPULATED ORDER STAYING PROCEEDINGS

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel in the above-captioned action that the case be stayed pending final adjudication in the trial court in *United States v. Raniere*, 18-cr-00204 (NGG), in accordance with the following:

WHEREAS this action, commenced by the filing of a complaint on January 28, 2020, asserts claims, among others, under 18 U.S.C. § 1595(a), and

WHEREAS, 18 U.S.C. § 1595(b)(1) provides that “[a]ny civil action filed under subsection (a) shall be stayed during the pendency of any criminal action arising out of the same occurrence in which the claimant is a victim,” and

WHEREAS, Section 1595(b)(2) provides that a criminal action remains pending “until final adjudication in the trial court,” and

WHEREAS, the undersigned parties stipulate and agree that *United States v. Raniere, et al.*, No. 18-cr-00204 (NGG), implicates and triggers the mandatory stay under 1595(b)(1), and

WHEREAS, on February 5, 2020, Plaintiffs filed a motion for a protective order and proposed order requesting leave to proceed under pseudonyms (ECF 22) (“Proposed Protective Order”), and

WHEREAS, Defendant Sara Bronfman-Igtet does not accept or agree with Plaintiffs' stated grounds for the Proposed Protective Order, but she nonetheless consents to entry of the Proposed Protective Order under the terms set forth below, and

WHEREAS, the undersigned parties respectfully request the Court to endorse and enter this proposed stipulated Order ("Proposed Stipulated Order"):

1. This action is stayed in its entirety, and all deadlines and further proceedings shall be adjourned until the date "of final adjudication in the trial court" for all defendants in *United States v. Raniere*. At such time, the stay in this action shall be lifted in accordance with Paragraph 2 below.

2. No later than one business day after the date of the final adjudication in the trial court for the last defendant in *U.S. v. Raniere*, Plaintiffs shall file with this Court a Notice advising this Court and the Clerk of its occurrence. Absent further Order of this Court, upon the filing of Plaintiffs' Notice of the final adjudication for the last defendant in *U.S. v. Raniere*, the Clerk shall enter on the docket a notice advising the parties that this Stay Order has been lifted and resetting all deadlines.

3. Defendant Sara Bronfman-Igtet has agreed to accept service through an agreement with Plaintiffs' counsel reflected in this Stipulation. By this Stipulation and acceptance of service of a summons and complaint in this action, however, Defendant Sara Bronfman-Igtet does not waive any defenses as to jurisdiction, venue, or any grounds other than defect in the summons or service of process.

4. As part of that agreement, Defendants are not required to file an answer or other response to the complaint under Fed. R. Civ. P. 12 and the Court's Individual Practices and Rules ("Response") until the stay has been lifted. Accordingly, the deadline to file a Response shall be twenty one (21) days from the date on which the stay is lifted.

5. Upon entry of this Proposed Protective Order and an appearance by Defendant Sara Bronfman-Igtet as described in Paragraph 3 above (under which she does not waive any defenses based on jurisdiction, venue, or any grounds other than defect in the summons or service of process), Plaintiffs' counsel will identify each and every Plaintiff to Defendant Sara Bronfman-Igtet. After the stay is lifted, Defendant Sara Bronfman-Igtet may challenge the Proposed Protective Order *de novo* under the same deadline for her Response set out in Paragraph 4 above.

STIPULATED TO AND APPROVED BY:

Date: February 20, 2020

/s/ J. Bruce Maffeo
J. Bruce Maffeo
John J. Sullivan
Nicole H. Sprinzen
Andrew D. Linz
Cozen O'Connor
45 Broadway, 16th Floor
New York, NY 10006

Counsel for Defendant Sara Bronfman-Igtet

/s/ Neil L. Glazer
Neil L. Glazer
William E. Hoese
Steven M. Steingard
Stephen H. Schwartz
Craig W. Hillwig
Zahra R. Dean
Aarthi Manohar
KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103
(215) 238-1700

Aitan D. Goelman
ZUCKERMAN SPAEDER
1800 M Street NW, Suite 1000
Washington, DC 20036
(202) 778-1800

Counsel for Plaintiffs

IT IS SO ORDERED

Date: March 3, 2020

s/Eric R. Komitee

Hon. Eric R. Komitee
United States District Judge